

**State of Louisiana  
Secretary of State**

02/21/2020

Legal Services Section  
P.O. Box 94125, Baton Rouge, LA 70804-9125  
(225) 922-0415

CMFG LIFE INSURANCE COMPANY  
CHIEF LEGAL OFFICER, MICHAEL ANDERSON  
P. O. BOX 391  
5910 MINERAL POINT ROAD  
MADISON, WI 53701

Suit No.: 200395  
4TH JUDICIAL DISTRICT COURT  
OUACHITA PARISH

BRUCE ARRANT  
vs  
CMFG LIFE INSURANCE COMPANY

Dear Sir/Madam:

I am enclosing a citation served in regard to the above entitled proceeding. If you are not the intended recipient of this document, please return it to the above address with a letter of explanation. All other questions regarding this document should be addressed to the attorney that filed this proceeding.

Yours very truly,

R. KYLE ARDOIN  
Secretary of State

Served on: R. KYLE ARDOIN  
Served by: E CUMMINS

Date: 02/20/2020  
Title: DEPUTY SHERIFF

**No: 1152294**

JG



**EXHIBIT 1**



OPC.CV.5932942

CE

### CITATION

BRUCE ARRANT

VS

CMFG LIFE INSURANCE COMPANY

DOCKET NUMBER: C-20200395

SEC: C1

STATE OF LOUISIANA

PARISH OF OUACHITA

FOURTH JUDICIAL DISTRICT COURT

OUACHITA PARISH

TO:

CMFG LIFE INSURANCE COMPANY  
THROUGH KYLE ARDOIN THE SECRETARY OF STATE  
8585 ARCHIVES AVENUE  
BATON ROUGE, LA

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition. The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within **FIFTEEN (15) days** after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Ouachita Parish Court House, 301 South Grand, Monroe, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within **FIFTEEN (15) days**, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Ouachita Parish, on this FEBRUARY 4, 2020.

OUACHITA PARISH CLERK OF COURT

Also attached are the following:

PETITION FOR PAYMENT OF BENEFITS UNDER ACCIDENTAL DEATH AND  
DISMEMBERMENT POLICY

CHLOE ELLINGTON

By: \_\_\_\_\_  
Deputy Clerk

FILED BY: J. RHYMES#11212

\_\_\_\_\_  
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\_\_\_\_\_  
SERVICE COPY  
\_\_\_\_\_  
FILE COPY

SERVED ON  
R. KYLE ARDOIN

FEB 20 2020

STATE SECRETARY OF STATE  
COMMERCIAL DIVISION

CERTIFIED  
TRUE COPY

FILED 04 2020  
B. \_\_\_\_\_  
DEPUTY CLERK  
4TH JUDICIAL DISTRICT COURT  
OUACHITA PARISH, LA

STATE OF LOUISIANA PARISH OF OUACHITA FOURTH JUDICIAL DISTRICT

BRUCE ARANT

FILED: FEB 04 2020

VS. 20-0395

CHLOE ELLINGTON

CMFG LIFE INSURANCE COMPANY

DEPUTY CLERK OF COURT

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**PETITION FOR PAYMENT OF BENEFITS  
UNDER ACCIDENTAL DEATH AND DISMEMBERMENT POLICY**

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The Petition of Bruce Arrant, individually, and as representative of the succession of Jimmie Arrant, respectfully represents that:

1.

Made defendant herein is:

CMFG Life Insurance Company, a subsidiary of CUNA Mutual  
Group of Waverly, Iowa, a foreign insurer authorized to issue insurance policies in  
the State of Louisiana.

2.

On or about June 1, 2008, the defendant issued to Jimmie Arrant, wife of Plaintiff, policy number G1848416 described as a "Group Death & Accidental Dismemberment Insurance" policy. The named beneficiary under the policy is Plaintiff, Bruce Arrant.

3.

The insured and Plaintiff properly made all payments to maintain the policy in effect between the date of issuance and July 19, 2019, the date of death of Jimmie Arrant

4.

Prior to her death, Jimmie Arrant suffered several accidental falls, including on October 18, 2018 and January 3, 2019. The falls were caused on one occasion by an uneven pavement in a parking lot and in the other a wet floor in a bath room. As a result of these falls Jimmie Arrant became completely blind in both eyes and eventually died on July 19, 2019. The policy in question provides for benefits to be paid in the event of the loss of vision and/or death, the policy itself being the best evidence of the contents thereof.

5.

Plaintiff made claims on the defendant for payment of the benefits due under the policy for the falls and blindness of Jimmie Arrant. To date, the defendant has arbitrarily and

capriciously withheld payment of benefits. All medical records establishing the claim have been provided to the defendant more than ninety days prior to the filing of this suit but the defendant has not only refused to honor the claim but also has refused to answer telephone calls from Plaintiff and has refused to return the medical records of Jimmie Arrant to Bruce Arrant.

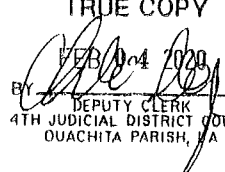
WHEREFORE, mover prays that after due proceedings there be judgment herein in his favor and against defendant, in a sum equal to the benefits provided for in the policy together with all costs of these proceedings, all penalties allowed by law, and reasonable attorney's fees.

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J. Michael Rhymes #11212  
Attorney at Law  
1005 North Third Street  
Monroe, LA 71201  
(318) 388-4500 - telephone  
Email: jmrhymes@gmail.com

Please Serve:

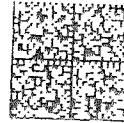
CMFG Life Insurance Company  
through  
Kyle Ardoin  
Secretary of State  
and Agent for Service of Process  
8585 Archives Ave.  
Baton Rouge, Louisiana

CERTIFIED  
TRUE COPY  
FEB 10 2020  
BY   
DEPUTY CLERK  
4TH JUDICIAL DISTRICT COURT  
OUACHITA PARISH, LA

R. KYLE ARDOIN  
SECRETARY OF STATE  
P.O. BOX 94125  
BATON ROUGE, LA 70804-9125



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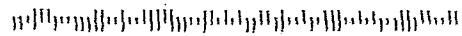


U.S. POSTAGE & PITNEY BOWES

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02 4th  
0000367315 FEB 21 2020

SS104 (R 06/18)

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**5710 Mail Room**

RCVD: 2/24/2020 9:35:16 AM

Carrier: CERTIFIED

BDG: CUNA

TO: Michael

**Anderson**

PH: x6858

DEPT: FID Licensing Appt Fees

PCS: 1 of 1

70191120000023726830



**Anderson, Michael**

Floor: **P013821/A1**

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